

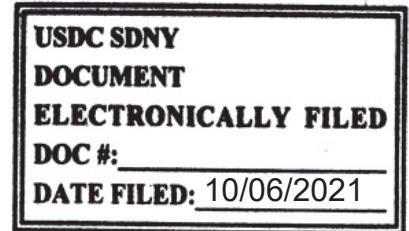
# OSBORN LAW P.C.

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October 6, 2021

**VIA ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Ramirez v. Commissioner of Social Security*,  
Civil Action No. 1:20-cv-10766-RWL

Dear Judge Lehrburger,

We write on behalf of plaintiff, Judith Ramirez, and with the consent of the defendant, to request an extension of all deadlines in the Court's February 4, 2021 Scheduling Order. This is plaintiff's first request for an extension of time.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. By **October 20, 2021**, Plaintiff must serve a written proposal for settlement on counsel for the Commissioner summarizing Plaintiff's strongest arguments;
- b. By **November 22, 2021**, the Parties shall either: (a) electronically file a stipulation dismissing, remanding, or otherwise resolving the case; or (b) electronically file a joint letter advising the Court that the parties are unable to resolve the case and are proceeding to brief their respective positions;
- c. If the Parties have not agreed to dismiss, remand or otherwise resolve the case, Plaintiff to file her motion for judgment on the pleadings on or before **December 9, 2021**;

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- d. Defendant to file its response/cross-motion on or before **February 7, 2022**; and
- e. Plaintiff to file her reply (if any) on or before **February 28, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Mary Ellen Brennan, Esq. (by ECF)

SO ORDERED:



10/06/2021

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HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE